

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

CORTNÉ MAREESE ROBINSON,

Petitioner,

v.

BOBBY LUMPKIN, Director, Texas
Department of Criminal Justice, Correctional
Institutions Division,

Respondent.

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CAUSE NO. 1:17-cv-00011-RWS

CASE INVOLVING THE DEATH
PENALTY

**MOTION TO FILE EXHIBITS 42, 44-51, 63, 64
TO AMENDED PETITION UNDER SEAL**

Petitioner Cortné Robinson, through counsel, files this Motion to request that Exhibits 42, 44-51, 63, 64 to his Amended Petition be filed under seal with this Court. Exhibits 63 and 64 are respectively Marshall Independent School District records of Robinson and his brother Corey Robinson. These contain sensitive and personally identifiable information throughout. Exhibits 42 and 44-51 are juror questionnaires that contain sensitive, personal information regarding members of the venire. They were sealed in the trial court below, in the habeas proceedings and remain sealed there.

On April 5, 2021, Counsel for Robinson has conferenced this motion with counsel for Respondent Garrett Greene who indicates that Respondent is unopposed.

Wherefore, for the foregoing reasons, Mr. Robinson respectfully requests that this Court seal the exhibits as well to protect the confidential information contained in Exhibits 42, 44-51, 63, 64 to his Amended Federal Application for Writ of Habeas Corpus.

Respectfully Submitted,

MAUREEN FRANCO
Federal Public Defender
Western District of Texas
TIVON SCHARDL
Chief, Capital Habeas Unit

/s/ Joshua Freiman
JOSHUA FREIMAN
Assistant Federal Public Defender
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Counsel for Petitioner

DATED: April 6, 2021

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of April, 2021, I electronically filed the foregoing Motion with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Garrett Greene
Texas Attorney General - Austin
300 West 15th Street
Austin, TX 78701-1220

/s/ Joshua Freiman